

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANICE STEVENSON,

Plaintiff,

v.

NEIGHBORHOOD HOUSE CHARTER
SCHOOL,

Defendant.

CIVIL ACTION NO. 05-CV-11584-DPW

PLAINTIFF'S MOTION TO EXCLUDE EVIDENCE

Plaintiff, Janice Stevenson ("Plaintiff") move this court to exclude deposition evidence and transcript presented by motion and affidavit by Defendant Neighborhood House Charter School ("Defendant", "NHCS") and its attorney, Barry Miller ("Miller"). As grounds for this Motion to Exclude Evidence, Plaintiff states as follows:

Admissibility of Evidence Based Violations of Guidelines.

The Transcript presented by Defendant and its attorney's affidavit is not a true record of the deposition that occurred on February 22, 2007. Plaintiff would not sign the transcript in its present form. The Defendant has deliberately omitted parts of the transcript in order to misrepresent facts to the court and others. The questions that were asked and answered are omitted.

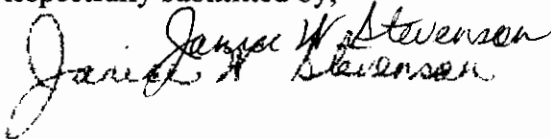
The Defendant and Miller deliberately omitted sections of the Transcript, in order to misrepresent facts to the court and others that demonstrated their behavior the court would not approve of.

Documents presented from the deposition of December 20, 2006 cannot be authenticated and should also be excluded. I stated my concerns during the deposition which appear to have been omitted from the transcript presented to this court. Miller stipulates that Plaintiff cannot ask questions to clarify, reduce confusion, and object to unauthenticated documents. Miller conduct to diminish Plaintiff participation in her deposition is a personal attack, inflammatory, and an attempt to increase his billing revenue.

Therefore, Plaintiff moves this Court to exclude Miller and Defendant's evidence submitted in violation of deposition guidelines.

Dated: March 13, 2007

Respectfully submitted by,



Janice Wilson Stevenson
P.O. Box 400372
Cambridge, MA 02140
617-721-2638 - ph
866-838-4286 - fax

CERTIFICATE OF SERVICE

I hereby certify that this document was served on NEIGHBORHOOD HOUSE CHARTER SCHOOL by electronic mail or facsimile to:

Lynn A. Kappelman (BBO # 642017)
Barry J. Miller (BBO # 661596)
SEYFARTH SHAW LLP
World Trade Center East
Two Seaport Lane, Suite 300
Boston, MA 02210-2028
Telephone: (617) 946-4800
Telecopier: (617) 946-4801

